

Luton Local Plan - Call for Sites

Land at 36-38 Crescent Road, Luton

July 2026

Ref: P1044c



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1.0 Introduction

- 1.1 Optimis Consulting is acting on behalf of the landowners to promote the site known as Land at 36-38 Crescent Road, Luton in response to the 'Call for Sites' consultation being undertaken by Luton Borough Council as part of the new Local Plan preparation.
- 1.2 This statement should be read alongside the completed Call for Sites Proforma and accompanying site location plan. It updates and supplements the site's planning history and continued promotion, having regard to the current 2026 consultation, the site's continuing availability, brownfield status, its central and highly sustainable location, and its realistic potential to deliver a meaningful quantum of new housing within the new plan period.
- 1.3 The site benefits from a significant material consideration in that planning permission has already been granted for the comprehensive redevelopment of the land to provide 90 residential dwellings under application reference 21/00731/FUL. The application was approved by Development Management Committee in August 2022.
- 1.4 Through the determination of the application, the Council concluded that the site comprises a sustainable brownfield opportunity capable of delivering much-needed housing in a location with excellent access to services, employment opportunities and public transport connections.

Background

- 1.5 Luton Borough Council (LBC) is currently working on the preparation of its new Local Plan which will direct the location, scale and type of development over the next period. Part of the new Plan preparation involves a Call for Sites consultation, which is an invitation to landowners, developers and agents to promote sites that may be used for the future development needs of the town.
- 1.6 An initial Call for Sites took place from December 2024 to February 2025, a second in the summer of 2025, with a further consultation now underway as part of the 2026 plan-making process. This consultation provides an opportunity to promote sites and ensure that the Council has the most accurate information available in respect of site suitability, availability, achievability and likely delivery timeframes.

Appendices

Appendix A – Committee Report (21/00731/FUL)

2.0 The Site and Surrounding Area

The Site

- 2.1 The site of 0.57 hectares is situated on the northern side of Crescent Road, occupying a prominent position to the northeast of Luton Town Centre. It is shown by the red line boundary in Figure 1 below.



Figure 1: Site Location (Source: Google Earth)

- 2.2 The site is a previously developed brownfield site within a highly sustainable location. Historically, the site has been used for a range of commercial and employment purposes and more recently, has accommodated a car and van rental facility, a warehouse building and large areas of open storage. It is generally level, although it is bound to the northeast by a steep, tree-covered embankment rising towards Hart Hill Drive.
- 2.3 The site benefits from a long frontage along Crescent Road, with direct access from two existing points. It is currently characterised by extensive areas of hardstanding associated with its former commercial uses. As a previously developed site, it represents a clear and sustainable redevelopment opportunity capable of making an efficient contribution towards Luton's long-term housing requirements.

The Surrounding Area

- 2.4 The site is positioned within a transitional area between the commercial uses associated with the railway corridor and the more residential character of the Hart Hill area. The surrounding townscape is varied in terms of both uses, building heights and appearance, comprising a mixture of apartment buildings, houses, community facilities and commercial premises.
- 2.5 To the northwest of the site lies The Martindales, which is a 4-storey flatted development. The site is separated from this development by a public footpath and mature trees providing a distinct boundary. To the northeast, beyond the steep embankment, are residential properties on Hart Hill Drive, which occupy a much higher ground level than the site itself. The embankment contains mature vegetation and tree cover which form a visual buffer. To the east is a place of worship, together with residential properties fronting onto Crescent Road. Towards the eastern end of Crescent Road, there are a number of commercial properties, including the Auction House site. Beyond this, to the south, is the railway.
- 2.6 The site is only around a 10-minute walk into the town centre, which offers a significant amount of services and facilities ranging between retail, restaurants, employment, convenience stores, health and wellbeing amongst others. As is stated above, the Power Court site is located a short distance away which highlights the strong strategic position of this area of the town.
- 2.7 Figure 2 below shows the site in the context of Luton town centre.

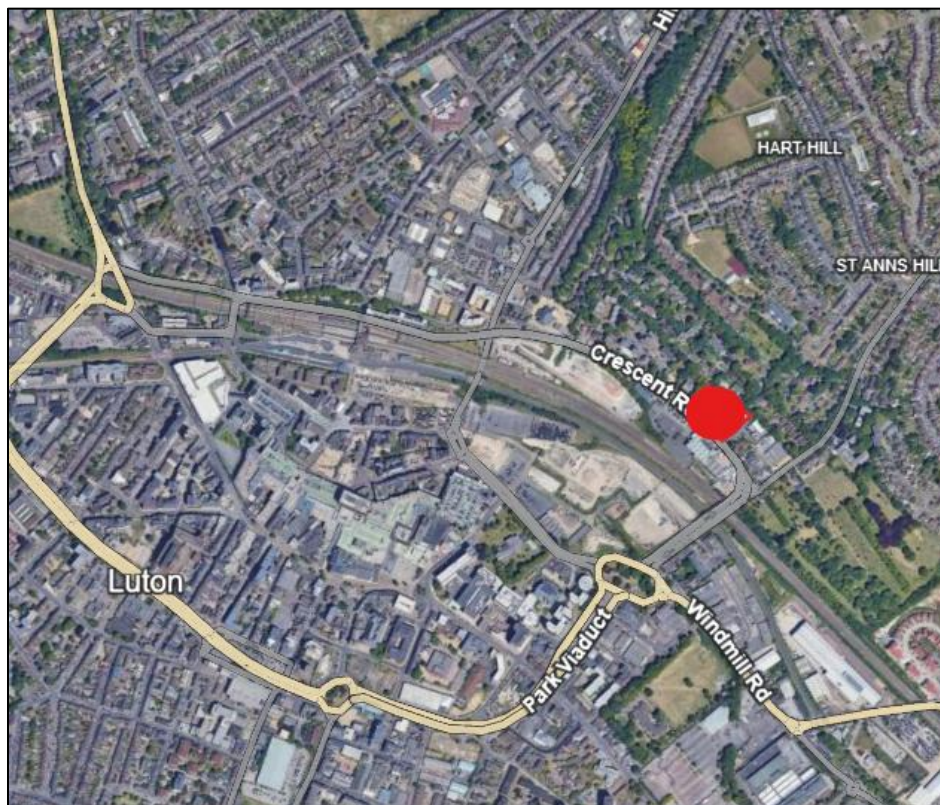


Figure 2: Site Context (Source: Google Earth)

Luton Policies Map

- 2.8 The Policies Map, which forms part of the adopted Local Plan, allocates the site as a Category B Employment Site. The Local Plan identifies such sites to represent poorer quality employment sites, though their release should be managed having regard to the need to maintain a sufficient supply of employment land. During the recently approved application, the Council undertook a detailed assessment of the site's employment function and accepted that its continued protection for employment purposes was not justified.
- 2.9 The site's allocation for residential development within the emerging Local Plan would therefore be entirely consistent with the Council's established planning position and would provide policy certainty on a site where the principle of residential development has been accepted through the grant of planning permission.

Site Planning History

- 2.10 The site has a detailed planning history that represents a material consideration in its assessment of suitability for allocation in the Local Plan. In particular, the principle of residential redevelopment has been established on two separate occasions, most recently through the grant of planning permission for 90 residential dwellings (LPA Ref. 21/00731.FUL). This demonstrates a long-standing acceptance by Luton Borough Council that the site is suitable for housing-led redevelopment.

Residential Development of 74 Dwellings

- 2.11 Historically, planning permission was granted in 2008 for the erection of three and four-storey buildings providing 74 residential dwellings (LPA Ref. 08/01090/FUL). Whilst not implemented, this remains a significant material consideration as it set out the establishment of residential development on this site.

Residential Development of 90 Dwellings

- 2.12 The most significant planning consideration affecting the site is the grant of planning permission under reference 21/0073/FUL for the demolition of the existing buildings and erection of 90 residential dwellings (comprising apartments and family housing). The application was approved by the Development Management Committee following comprehensive assessment of the site's suitability.
- 2.13 This scheme highlights the site's ability to accommodate a substantial quantum of housing whilst also delivering high-quality design, amenity provision and landscaping.
- 2.14 The Committee Report discusses the principle of development and describes the site to be a brownfield site in a sustainable location, within walking distance to town centre amenities and transport links. As a Category B employment site, an assessment was made on the loss of its protection for employment purposes. The applicant referred to an Employment Land Review which was undertaken in 2015 and identified the site to have shortcomings with regard to the proximity to residential properties which hindered its ability to enhance employment use. This, in combination with the vast investment required to bring the site up to the appropriate standard, the LPA agreed that sufficient justification for the loss had been provided.

- 2.15 More broadly, the site's location on the outskirts of the town centre is considered highly sustainable and one that could help contribute to the council's targets around carbon neutrality. Reduced parking spaces with a focus on cycle storage and the site's strong position with regard to bus and train services ensure that this site can meet such standards. The council similarly recognises that the importance of bringing forward much-needed regeneration and its associated economic benefits, as well as the improvements to both social and environmental sustainability objectives that this site can provide.
- 2.16 The applicant has continued to address matters of detail relating to this development, through the submission of conditional requirements. Since the grant of permission, work has continued to progress the discharge of planning conditions and associated technical assessments required to facilitate development.
- 2.17 In support of the implementation process, a detailed ground investigation has been undertaken across the site to assess ground conditions, contamination risks and the suitability of the land for residential development. Overall, the findings confirm that there are no abnormal ground conditions or contamination issues that would prevent the delivery of the approved residential development. The completion of this technical work further demonstrates the site's deliverability and the applicant's continued commitment to progressing the scheme towards implementation.



Figure 3: Proposed Site Plan at Crescent Road (CMI Architecture)

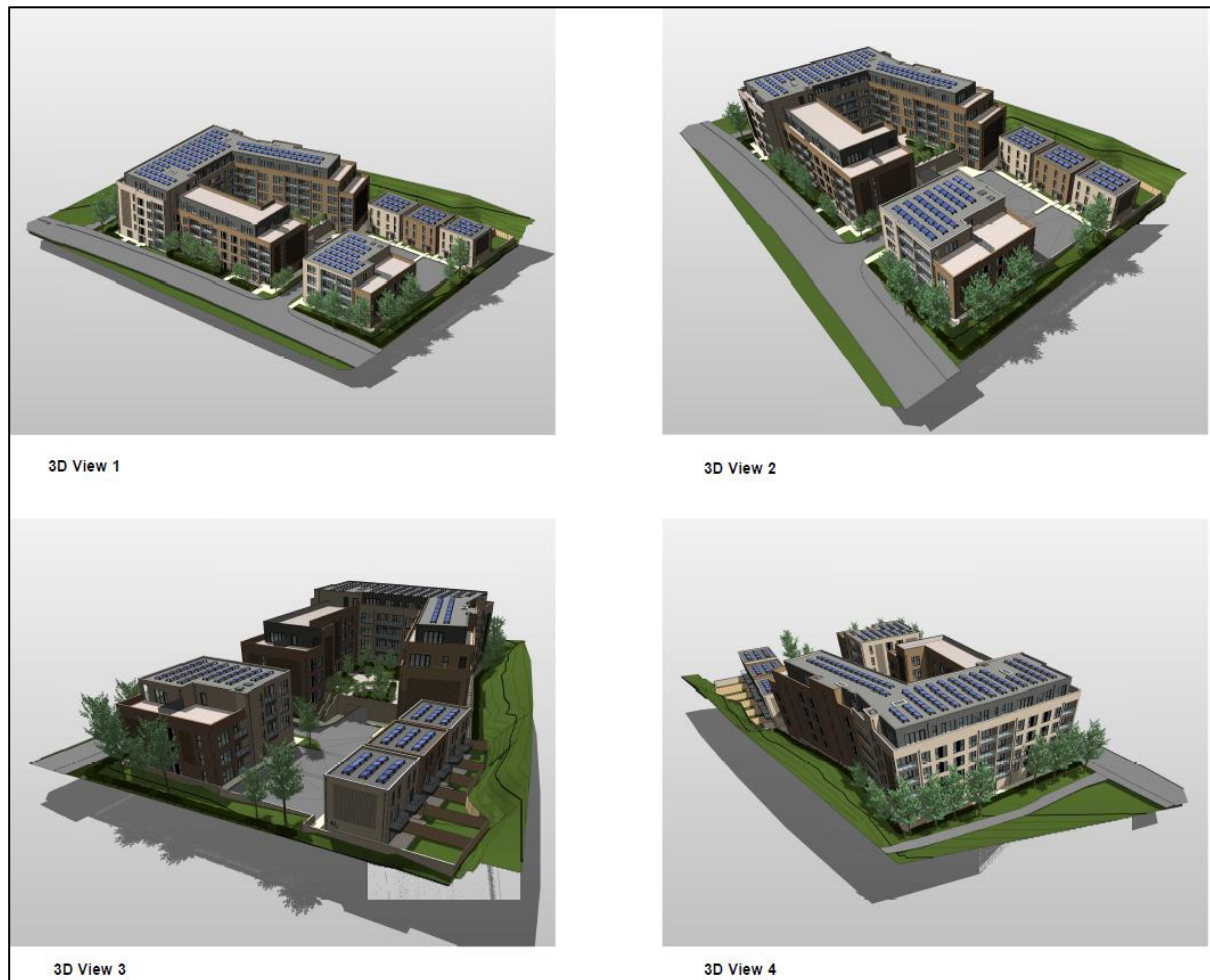


Figure 4: Proposed 3D Views (CMI Architecture)

Conclusion

- 2.18 Importantly, the grant of planning permission demonstrates that the site is not only suitable for residential development but is also capable of accommodating a substantial number of dwellings within the urban area. The approved scheme establishes a realistic deliverable development capacity that can contribute towards housing delivery throughout the emerging plan period.
- 2.19 The planning history of the site provides compelling evidence in support of its allocation for residential development within the emerging Local Plan. The principle of housing redevelopment has now been accepted on two separate occasions through the granting of planning permission.
- 2.20 Of particular importance in the context of continued assessment, the Council's detailed assessment of the 90-dwelling scheme confirms that:
- The site is a sustainable brownfield location suitable for housing development;
 - The continued protection of the site for employment purposes is not justified;
 - Residential redevelopment would contribute positively to regeneration objectives;

- The site is capable of accommodating a significant quantum of housing; and
- The redevelopment of the site would accord with wider sustainability objectives.

3.0 Site Analysis

- 3.1 This section identifies site features and how they can be appropriately considered within the context of a housing development.

Flood Risk

- 3.2 The site is located entirely within Flood Zone 1, which represents the lowest possible risk of flooding. The site has recently been subject of detailed design assessment through engagement with the relevant water authorities. There is no evidence to suggest that flood risk would prevent the site's allocation or redevelopment.

Heritage

- 3.3 The site itself does not contain any designated heritage assets and there are similarly nonadjacent or close to the site. This includes a designated conservation area, listed buildings, scheduled monuments and assets of other historic significance.

Tree Preservation Orders (TPOs)

- 3.4 Whilst the site does contain a number of mature trees subject of TPOs, the Council's recent assessment confirmed that the approved development could be delivered alongside the retention of protected trees. Suitable mitigation and protection measures can be implemented and managed through the construction of the development.
- 3.5 The previous scheme demonstrated that the development of this site could be achieved whilst retaining the majority of protected trees and ensuring appropriate mitigation measures could be secured during construction. The Committee Report notes that no protected trees were identified for removal and that impacts could be managed through the relevant arboricultural safeguards.
- 3.6 The relationship between the site, mature vegetation and the elevated landform to the northeast was considered throughout the design of the scheme and subsequently carefully assessed by the Council.

Ecology and Biodiversity

- 3.7 The site is considered to have a relatively low ecological value across the developable area, predominantly due to the extensive hard-surfacing and previously developed nature. The site is located within, nor immediately adjacent to any statutory or non-statutory ecological designations.

Accessibility and Sustainable Transport

- 3.8 The site occupies a significantly sustainable location for potential residential development within the town. It lies approximately 850m from Luton Railway Station and is within convenient walking distance of the bus interchange, town centre facilities, employment areas and a range of local services.

- 3.9 The Council's previous assessment placed significant weight on the site's highly sustainable location, recognising that future residents would have access to a wide range of travel choices and would be less reliant on private vehicle use. The approved scheme was supported with reduced parking provision and substantial cycle parking, which reflects the site's accessibility credentials.

National Designations

- 3.10 Luton Borough is not affected by nationally significant designations such as the Green Belt or AONB.

Site Analysis Summary:

- Previously developed brownfield land
- Existing planning permission for 90 dwellings
- Least risk of flooding
- No national land designations
- TPO impact to be mitigated
- No impact on public rights of way
- Good opportunities for BNG enhancements
- No impact on designated heritage assets

4.0 The Development Opportunity

- 4.1 As is described and established through permissions, the site represents a hugely compelling residential allocation opportunity within the urban area of Luton. Unlike many promoted sites, the principle of residential development has already been fully assessed and accepted by the Council through the grant of permission for 90 dwellings.
- 4.2 The approved scheme demonstrates that the site is suitable, available and achievable for residential development and is capable of making a meaningful contribution towards the Borough's future housing requirements. Allocation within the emerging Local Plan would therefore reflect an established planning position and provide policy certainty regarding the site's future use.

Existing Planning Permission

- 4.3 Planning permission has been granted for the redevelopment of the site to provide 90 dwellings comprising a mix of apartments and family housing alongside associated landscaping, amenity space, parking and cycle infrastructure. The approved development includes a range of one, two, three and four-bedroom accommodation, delivering a significant proportion of family housing within a sustainable urban location.
- 4.4 The Council's assessment concluded that the development would provide a sustainable and high-quality form of residential development that would make effective use of previously developed land and contribute towards housing delivery, regeneration and wider sustainability objectives.
- 4.5 Importantly, the approved scheme establishes a realistic capacity for the site's development. Future proposals may evolve further within the design process, though nevertheless the approval provides robust evidence of the ability to accommodate 90 dwellings.

Deliverability

- 4.6 The NPPF clarifies that for a site to be considered deliverable, it should be available for housing immediately, offer a suitable location for development, and be achievable with a realistic prospect that housing is able to be delivered on site within five years. This site performs strongly against each of these criteria.
- 4.7 The suitability of the site has already been demonstrated through the grant of planning permission. Through the determination of application reference 21/00731/FUL, the Council concluded that there were no overriding environmental, technical, design, transport, drainage, or amenity constraints preventing residential development.
- 4.8 The site is available for redevelopment and benefits from a clearly established residential planning strategy. Unlike many promoted sites, significant work has been undertaken to assess development constraints and confirm the site's capacity to accommodate housing. This significant reduces the planning risk and increases confidence in delivery.
- 4.9 The existence of planning permission on the site is a significant indicator of its capability of contributing towards housing delivery through the emerging plan period. It demonstrates that

the site can come forward without reliance upon major infrastructure interventions or complex policy changes.

Contribution to Housing Delivery

- 4.10 The site is capable of making a meaningful contribution to the Borough's housing requirements over the emerging plan period. The approved scheme reinforces this capacity.
- 4.11 In addition to the overall housing contribution, the approved development highlights that forthcoming development is able to provide a range of dwelling types including family accommodation, supporting a more balanced housing offering. The Council's assessment concluded that the scheme would provide a positive housing mix contributing towards a local identified need.
- 4.12 The redevelopment of the site would also support wider regeneration objectives by increasing the residential population within close proximity to the town centre, helping to support local business, public transport services and community infrastructure. The Committee Report identified these wider economic and regeneration benefits as significant positive factors in favour of the development.

Residential Allocation Strategy

- 4.13 Whilst the site benefits from a recent consent, a formal allocation within the Local Plan remains important for a number of reasons.
- 4.14 Allocation would ensure a consistency between the Council's strategic planning objectives and the conclusions reached through the development management processes. The Council has already accepted the principle of residential development and the release of the site from employment use. An allocation would reflect this established position and provide long-term security of housing delivery.
- 4.15 The long-term certainty provided through the allocation would secure the site's role in meeting housing needs, but also remove ambiguity in its current employment designation. The Committee Report clearly concluded that the site was not well suited to meeting future employment requirements and that residential redevelopment represented a more appropriate and suitable use of the land.
- 4.16 This site represents a deliverable brownfield housing opportunity that has already demonstrated its capacity through an approved scheme. It is therefore precisely the type of site that should be identified and supported through the development plan process. It should, in addition, be added to the Council's Brownfield Register.

Five Year Housing Land Supply

- 4.17 Luton's latest 5 Year Housing Land Supply Statement (for the period from April 2025) states that there is currently 4.64 years worth of supply, which is below the 5-year target. There is therefore a recognised need for additional housing sites to come forward. The new Local Plan will seek to allocate sustainably located sites that can aid in addressing the continued shortfall. The current site represents a strong opportunity for housing and inclusion within the Plan.

Conclusion

- 4.18 Land at 36-38 Crescent Road, Luton represents a highly sustainable and deliverable brownfield redevelopment opportunity within central Luton.
- 4.19 The Council has already concluded that the site is suitable for housing, that the release of the site from employment use is justified, and that redevelopment would deliver substantial regeneration, sustainability and housing benefits.
- 4.20 The site therefore represents a logical and evidence-based residential allocation within the emerging Local Plan and should be identified accordingly as part of the Council's strategy for the meeting future housing needs.